

REMARKS

This is in response to the Final Office Action that was mailed on June 1, 2007. Claims 1-5 and 7-34 were pending in that action. All claims were rejected. With the present response, claims 1 and 20 are amended and claims 4, 25, 27, 29 and 30 are cancelled. Reconsideration and allowance of all pending claims are respectfully requested in light of the following comments.

Beginning on page 5 of the Office Action, claims 1-5 and 8 are rejected under 35 U.S.C. §103 as being unpatentable over U.S. Patent No. 6,732,095 (hereinafter referred to as “the Warshavsky et al. reference”) in view of U.S. Patent No. 6,915,304 (hereinafter referred to as “the Krupa reference”) and further in view of U.S. Patent No. 6,112,199 (hereinafter referred to as “the Nelson reference”). Beginning on page 5 of the Office Action, claims 7 and 9 are rejected under 35 U.S.C. §103(a) as being unpatentable over the Warshavsky reference in view of the Krupa reference and further in view of the Nelson reference and further in view of U.S. Patent No. 6,016,497 (hereinafter referred to as “the Suver reference”). On page 10 of the Office Action, the Examiner rejected claim 10 under 35 U.S.C. §103(a) as being unpatentable over the Warshavsky reference in view of the Krupa reference and further in view of the Nelson reference and further in view of the Suver reference and further in view of U.S. Patent Publication No. 2002/0065879 (hereinafter referred to as “the Ambrose reference”). Beginning on page 10 of the Office Action, the Examiner rejected claims 11-18 under 35 U.S.C. §103(a) as being unpatentable over the Warshavsky reference in view of the Krupa reference and further in view of the Nelson reference and further in view of U.S. Patent No. 6,582,098 (hereinafter referred to as “the Lau reference”). Beginning on page 14 of the Office Action, the Examiner rejected claim 19 under 35 U.S.C. §103(a) as being unpatentable over the Warshavsky reference in view of the Krupa reference and further in view of the Nelson reference and further in view of U.S. Patent No. 6,356,901 (hereinafter referred to as “the Macleod reference”). Beginning on page 14 of the Office Action, the Examiner rejected claims 20-22 under 35 U.S.C. §103(a) as being unpatentable over the Warshavsky reference in view of the Krupa reference. Beginning on page 16 of the Office Action, the Examiner rejected claim 23 under 35 U.S.C. §103(a) as being unpatentable over the Warshavsky reference in view of the Krupa reference and further in view

of the Nelson reference. Beginning on page 16 of the Office Action, the Examiner rejected claim 24 under 35 U.S.C. §103(a) as being unpatentable over the Warshavsky reference in view of the Krupa reference and further in view of U.S. Patent No. 6,016,497 (hereinafter referred to as “the Subramanian reference”). Beginning on page 17 of the Office Action, the Examiner rejected claim 25 under 35 U.S.C. §103(a) as being unpatentable over the Warshavsky reference in view of the Krupa reference and further in view of Suver reference. Beginning on page 18 of the Office Action, the Examiner rejected claim 26 under 35 U.S.C. §103(a) as being unpatentable over the Warshavsky reference in view of the Krupa reference and further in view of Suver and Ambrose reference. Beginning on page 19 of the Office Action, the Examiner rejected claims 27-34 under 35 U.S.C. §103(a) as being unpatentable over the Warshavsky reference in view of the Krupa reference and further in view of Lau reference. Beginning on page 22 of the Office Action, the Examiner rejected claims 20-22 under 35 U.S.C. §103(a) as being unpatentable over the Warshavsky reference in view of U.S. Patent Publication No. 2003/0023608 (hereinafter referred to as “the Egilsson reference”). On page 23 of the Office Action, the Examiner rejected claim 23 under 35 U.S.C. §103(a) as being unpatentable over the Warshavsky reference in view of the Egilsson reference and further in view of the Subramanian reference. On page 24 of the Office Action, the Examiner rejected claim 25 under 35 U.S.C. §103(a) as being unpatentable over the Warshavsky reference in view of Egilsson reference and further in view of the Suver reference. On page 24 of the Office Action, the Examiner rejected claim 24 under 35 U.S.C. §103(a) as being unpatentable over the Warshavsky reference in view of the Egilsson reference and further in view of the Subramanian reference and further in view of the Suver reference. On page 25 of the Office Action, the Examiner rejected claim 26 under 35 U.S.C. §103(a) as being unpatentable over the Warshavsky reference in view of Egilsson reference and further in view of the Suver and Ambrose references. Beginning on page 26 of the Office Action, the Examiner rejected claims 27-34 under 35 U.S.C. §103(a) as being unpatentable over the Warshavsky reference in view of the Egilsson reference and further in view of the Lau reference.

In order to reject Applicant's claims, the Examiner has cited **nine** different references in **seventeen** different diverse combinations. Specifically, the Examiner's combination rejections are organized as follows:

Warshavsky + Krupa + Nelson

Warshavsky + Krupa + Nelson + Suver

Warshavsky + Krupa + Nelson + Suver + Ambrose

Warshavsky + Krupa + Nelson + Lau

Warshavsky + Krupa + Nelson + Macleod

Warshavsky + Krupa

Warshavsky + Krupa + Nelson

Warshavsky + Krupa + Subramanian

Warshavsky + Krupa + Suver

Warshavsky + Krupa + Suver + Ambrose

Warshavsky + Krupa + Lau

Warshavsky + Egilsson

Warshavsky + Egilsson + Subramanian

Warshavsky + Egilsson + Suver

Warshavsky + Egilsson + Subramanian + Suver

Warshavsky + Egilsson + Suver + Ambrose

Warshavsky + Egilsson + Lau

Further, many of the nine cited references come from dissimilar areas of technology. For example, one reference is related to mapping between XML and relational data representations (Warshavsky), one reference is related to storing and accessing embedded information in O-R databases (Suver), one reference is related to a client server-related architecture (Ambrose), one reference is related to data item values (Nelson), one reference is related to populating data cubes

using calculated relations (Egilsson), and another reference is related to runtime optimization and customization of database applications (Subramanian).

Applicant recognizes the Examiner has the right to combine any number of references in order to reject claims, so long as the references in combination teach the recited elements and the combination would be obvious. However, it is respectfully submitted that, in the present case, because the Examiner is required to combine so many diverse references in so many diverse combinations in order to even reject the claims, this in and of itself argues that the claims are non-obvious because the combinations of references are non-obvious. At some point, it becomes clear that no one skilled in the art could ever even conceive such complex and diverse combinations, much less consider them obvious. Applicant respectfully submits that the cited rejections have moved beyond that point.

The currently pending claims are claims 1-3, 5, 7-24, 26, 28 and 31-34. Of these claims, claims 1 and 20 are in independent form. The remaining pending claims are dependent thereon. With the present response, independent claims 1 and 20 have been amended such that they now include a combination of features that have not, during prosecution up to this point, been considered by the Examiner. It is respectfully submitted that these combinations of features in the independent claims are patentably distinguishable from the cited references. Accordingly, it is respectfully submitted that all pending claims are now in condition for allowance based at least upon the allowability of the independent claims.

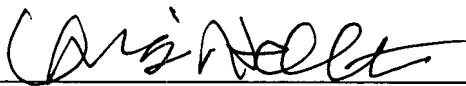
With the present response, independent claim 1 has been amended to include the features of former dependent claim 4. Claim 4 has been cancelled accordingly. More specifically, independent claim 1 has been amended such that the claimed intermediate database system is limited to including an entity extension table and an entity base table. It is respectfully submitted that none of the cited references, considered independently or in combination, teach or suggest an intermediate database system having the claimed combination of tables. For at least this reason, it is respectfully submitted that independent claim 1 and its associated dependent claims are in allowable form.

Further, with the present response, independent claim 20 has been amended to include the features of former dependent claims 25, 27, 29 and 30. Claims 25, 27, 29 and 30 have been cancelled accordingly. More specifically, independent claim 20 has been amended to further clarify that the claimed migration overhead information is user-configurable and includes information about which entities are to be migrated, which attributes will be migrated, and migration order. It is respectfully submitted that the cited references, considered independently or in combination, fail to teach or suggest the elements of independent claim 20 and its associated dependent claims.

In summary, it is respectfully submitted that claims 1-3, 5, 7-24, 26, 28, and 31-34 recite limitations that are neither taught nor suggested by any of the cited references considered independently or in combination. Reconsideration and allowance of these claims are respectfully solicited. The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

WESTMAN, CHAMPLIN & KELLY, P.A.

By: 

Christopher L. Holt, Reg. No. 45,844
900 Second Avenue South, Suite 1400
Minneapolis, Minnesota 55402-3319
Phone: (612) 334-3222 Fax: (612) 334-3312

CLH:rkp